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March 19, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Appeal  
New London Public Schools  
Funding Year 2010  
Form 471 746248  
Funding Request Numbers 2014294, 2014299 and 2014304

Dear Secretary Dortch:

This is a petition for reconsideration of an order adopted February 20, 2014, DA No. 14-234 for the New London Public Schools. A request for review was filed on November 18, 2013 regarding a denial of a deadline extension request for the district.

An Invoice Deadline Extension Request was filed requesting additional time to file invoices on all FRNs filed under FCC Form 471 #746248. This Extension Request was denied for the following reason:

"Current guidelines and procedures require Invoice Deadline Extension requests to be filed by the end of the relevant invoice receipt period for the service category of the FRN requiring an extension (120 days after the end of the service delivery date). The extension request was not filed in a timely manner, so it is denied."

This explanation explicitly contradicts information provided on USACs website, available to all applicants. The explanation above essentially states that an Invoice Extension Request must be filed before the deadline to file an Invoice passes.

However, on USAC's webpage regarding Invoicing (<http://www.usac.org/sl/applicants/step07/default.aspx>), under "Filing Deadline" section it is stated:

"You must file and your service provider must approve BEAR Forms no later than 120 days after the last day to receive service or 120 days after the FCC Form 486 Notification Letter date, whichever is later. If you miss this deadline you can request an invoice deadline extension."

It is also stated on the Invoice Extension page (<http://www.usac.org/sl/applicants/step07/invoice-extensions.aspx>):

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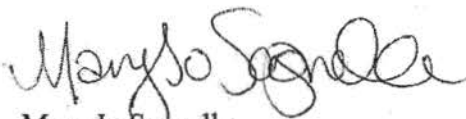
"If an applicant or service provider has missed the deadline for submitting an invoice – FCC Form 472 (BEAR Form) or FCC Form 474 (SPI Form) – the applicant or service provider must request an extension of the deadline before a new invoice can be submitted."

USAC's denial reason for this Invoice Deadline Extension Request explicitly contradicts USACs rules and guidelines provided to the applicants, which indicates that a Deadline Extension must be filed after 120 days past the end of the service delivery date, not before as the Denial Explanation indicates.

Also, while no flaw in the reason behind the Extension Request is listed in USACs decision, per USAC's "Conditions for Extensions", FCC Form 472's fall under "Documentation requirements that necessitate third-party contact or certification per the Form's Block 4: Service Provider Acknowledgement. Due to changes in personnel and a very late funding commitment, it was not possible for the New London Public Schools to file for reimbursements within the original time allotted. In addition, as cited in the original letter of appeal, there was no response from USAC when a deadline was requested.

As such, due to the contradiction between USAC's Denial Explanation and USAC's Conditions for Extensions, I request that the Invoice Deadline Extension Request for the New London Public School District FCC Form 471 #746248 be reconsidered, as other applications for the same issue and funding year have.

If you have any questions please don't hesitate to contact me.



Mary Jo Sagnella  
Director of Operations  
E-RATE ONLINE, LLC  
856 Main Street  
Monroe, CT 06468  
203 445-9577